Federal Operating Permit
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	International Paper
Facility Name:	Shorewood Packaging Corporation of Virginia
Facility Location:	815 Chapman Way Newport News, Virginia
Registration Number:	60913
Permit Number:	TRO-60913

July 29, 2002
Initial Permit Date

November 5, 2003
Modification Date

July 29, 2007
Expiration Date

_____(for)_
Robert G. Burnley
Director, Department of Environmental Quality

November 5, 2003____
Signature Date

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I. Facility Information

Permittee
International Paper
6420 Polar Avenue 5-019
Memphis, TN 38197

Facility
Shorewood Packaging Corporation of Virginia
815 Chapman Way
Newport News, VA, 23608

Responsible Official
Mr. John Cotè
General Manager, Shorewood Packaging in Newport News

Contact Person
Orville Calhoun
Regional Environmental Health and Safety Manager
(757) 989-1613

AFS Identification Number: 51-700-00066

Facility Description: SIC Code 2752 & 2754. The facility is a commercial printing operation using three centers of packaging rotogravure and lithographic presses to manufacture folding cartons.
Production Center: the three packaging rotogravure presses and two stand alone coaters, each using a total enclosure that is connected to the Production Center catalytic incinerator for VOC/HAP control.
Technical Center: the one packaging rotogravure press, which includes a coating station, that uses a total enclosure connected to the Technical Center catalytic incinerator for VOC/HAP control.
Lithographic Center: the three non-heatset sheetfed offset lithographic presses that use conventional inks, UV inks, and water based coatings.

II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Production Center							
RGP-1	1a & 1b	Packaging rotogravure press, JOSH.	Six Rotogravure stations and Six Lithographic stations, web width of 28 inches, and rated at 539 ft/min.	Catalytic incinerator, Grace TEC Systems, Model Mangnum Quantum 41000. 1995	CI-1	VOC/HAPS	November 8, 2002, as amended 04/21/03
RGP-2	1a & 1b	Packaging rotogravure press, Bobst Champlain, Model M873. 1989	Eight stations, web width of 44 inches, and rated at 550 ft/min.	Catalytic incinerator, Grace TEC Systems, Model Mangnum Quantum 41000. 1995	CI-1	VOC/HAPS	November 8, 2002 , as amended 04/21/03
RGP-3	1a & 1b	Packaging rotogravure press, Bobst Champlain, Model M873 with electron beam curing option. 1982	Nine stations, web width of 44 inches, and rated at 600 ft/min, with electron beam drying option.	Catalytic incinerator, Grace TEC Systems, Model Mangnum Quantum 41000. 1995	CI-1	VOC/HAPS	November 8, 2002 , as amended 04/21/03
C-1	1a & 1b	Coater, Billhofer, Model Galamat EHN 142. 1994	Sheet size of 40" X 55", 3200 sheets/hr or 150 ft/min	Catalytic incinerator, Grace TEC Systems, Model Mangnum Quantum 41000. 1995	CI-1	VOC/HAPS	November 8, 2002, as amended 04/21/03
C-2	1a & 1b	Coater, Billhofer, Model Palamat CPJN-127. 1996	Sheet size of 50" X 50", 7000 sheets/hr or 330 ft/min	Catalytic incinerator, Grace TEC Systems, Model Mangnum Quantum 41000. 1995	CI-1	VOC/HAPS	November 8, 2002 , as amended 04/21/03
Technical Center							
RGP-4	2	Packaging rotogravure press, Chambon, Model 176-597. 1994	Eight stations, web width of 13.5 inches, and rated at 550 ft/min.	Catalytic incinerator, M & W Industries. 1994	CI-2	VOC/HAPS	November 8, 2002 , as amended 04/21/03
Lithographic Center							
LP-1	N/A	Lithographic press, KBA 130 Planeta. 2002	Non-heatset sheetfed offset lithographic press consisting of eight print units and two coating units, a sheet width of 51 inches and rated at 15,000 sheets/hr.	N/A			November 8, 2002, as amended 04/21/03
LP-2	N/A	Lithographic press, KBA Planeta Rapida, Model RA 130A-7 + LALW. 1997	Non-heatset sheetfed offset lithographic press consisting of seven print units and one coating unit, a sheet width of 51 inches and rated at 15,000 sheets/hr.	N/A			November 8, 2002, as amended 04/21/03
LP-3	N/A	Lithographic press, KBA Planeta Rapida, Model RA 130-7 + L-ALV. 1998	Non-heatset sheetfed offset lithographic press consisting of seven print units and one coating unit, a sheet width of 51 inches and rated at 15,000 sheets/hr. Can use UV inks.	N/A			November 8, 2002, as amended 04/21/03

(9 VAC 5-80-110 and Condition 2 of NSR permit dated 11/08/2002, as amended on 04/21/2003

III. Production Center/Technical Center – (RGP 1-4 and C 1 & 2), NSR permit of 11/08/2002

A. Limitations

1. **Emission Controls** - Volatile organic compound (VOC) emissions from three rotogravure presses (RGP-1 thru 3) and the two coating machines (C-1 & 2) in the production center shall be controlled by a total enclosure capture system and a catalytic incinerator having at least 95% destruction efficiency. The printing presses, coating machines and catalytic incinerator shall be provided with adequate access for inspection.
   (9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 4 of NSR permit dated 11/08/2002)

2. **Emission Controls** - When there are no VOC emissions from using the UV coatings on C-1, the Gulamat EHN-142, in the production center, then the total enclosure capture system and catalytic incinerator do not need to be in use for this coating machine.
   (9 VAC 5-80-110, 9 VAC 5-170-160, and Condition 5 of NSR permit dated 11/08/2002)

3. **Monitoring Devices** - Each chamber of the catalytic incinerator for the production center shall maintain a minimum inlet temperature of 600 °F (clock hourly average) and a retention time of 0.34 seconds. Each chamber of the catalytic incinerator shall be equipped with devices to continuously measure temperature before and after the catalyst bed and the pressure drop across the catalyst bed. The maximum outlet temperature from each chamber of the catalytic incinerator shall not exceed 1200 °F (clock hourly average). The permittee shall maintain records of the manufacturer's recommendations for catalyst bed replacement and records of actual catalyst bed replacement.
   (9 VAC 5-80-110, 9 VAC 5-50-20 C, 9 VAC 5-50-260, and Condition 6 of NSR permit dated 11/08/2002)

4. **Emission Controls** - Volatile organic compound (VOC) emissions RGP 4 in the tech center shall be controlled by a total enclosure efficient capture system and a catalytic incinerator having at least 95% destruction efficiency. The printing press and catalytic incinerator shall be provided with adequate access for inspection.
   (9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 7 of NSR permit dated 11/08/2002)

5. **Monitoring Devices** - The catalytic incinerator for the tech center shall maintain a minimum inlet temperature of 550 °F (clock hourly average) and a retention time of 0.20 seconds. The catalytic incinerator shall be equipped with devices to continuously measure temperature before and after the catalyst bed and the pressure drop across the catalyst bed. The maximum outlet temperature from the catalyst bed shall not exceed 1200 °F (clock hourly average). The permittee shall maintain records of the manufacturer's recommendations for catalyst bed replacement and records of actual catalyst bed replacement.
   (9 VAC 5-80-110, 9 VAC 5-80-1180, 9 VAC 5-50-20 C, 9 VAC 5-50-260, and Condition 8 of NSR permit dated 11/08/2002)

6. **Emission Controls** - The total enclosure shall meet the following criteria:

   a. Any natural draft openings shall be at least 4 equivalent opening diameters from each VOC emitting point;

   b. The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;

   c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure.

   d. All access doors and windows shall be closed during routine operation of the presses or coaters.

   (9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 9 of NSR permit dated 11/08/2002)

7. **Emission Controls** - All the dampers in the duct work in the Production Center and Tech Center which could cause any fugitive VOCs to escape to the atmosphere shall be kept closed at all times except in case of a fire hazard.
(9 VAC 5-80-110, 9 VAC 5-170-160, and Condition 10 of NSR permit dated 11/08/2002)

8. **Throughput** - The combined throughput of materials to the three packaging rotogravure press units of RGP 1-3 from the usage of inks, coatings, thinners, and cleaners (combined) shall generate no more than 1267.0 tons of VOCs per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 14 of NSR permit dated 11/08/2002)

9. **Throughput** - The combined throughput of materials to the two coating machines (C 1-2 combined) shall generate no more than 270.5 tons of VOCs per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110, 9 VAC 5-80-1180 H, and Condition 15 of NSR permit dated 11/08/2002)

10. **Throughput** - The throughput of materials to RGP-4 in the tech center from the usage of inks, coatings, thinners, cleaners shall generate no more than 144.0 tons of VOCs per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 16 of NSR permit dated 11/08/2002)

11. **Emission Limits** - Emissions from the operation of the rotogravure presses RGP 1-3 (combined) shall not exceed the limits specified below:

Volatile Organic Compounds	63.4 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers A.1 and A.8.
(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 22 of NSR permit dated 11/08/2002)

12. **Emission Limits** - Emissions from the operation of the two coating machines (C 1-2 combined) shall not exceed the limits specified below:

Volatile Organic Compounds	13.5 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers A.1 and A.9.
(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 23 of NSR permit dated 11/08/2002)

13. **Emission Limits** - Emissions from the operation of the RGP-4 in the tech center shall not exceed the limits specified below:

Volatile Organic Compounds	3.8 lbs/hr	7.2 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers A.4 and A.10.
(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 24 of NSR permit dated 11/08/2002)

14. **Visible Emission Limits** - Visible emissions from each of the catalytic incinerator stacks shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 26 of NSR permit dated 11/08/2002)

15. **Facility or Control Equipment Malfunction - Hazardous Air Pollutant Processes:** The processes listed below shall, upon request of the Department, shut down immediately if its emissions increase in any amount because of a bypass, malfunction, shutdown or failure of the process or its associated air pollution control equipment. The processes shall not return to operation until it and the associated air pollution control equipment are able to operate in the proper manner.
    a. Gravure Presses 1-3 and/or Coaters 1-2 in Production Center,
    b. Gravure Press in Technical Center.
    (9 VAC 5-80-110, 9 VAC 5-20-180 F 3, and Condition 34 of NSR permit dated 11/08/2002)

16. **Maintenance/Operating Procedures** - In the Production Center and Tech Center, the permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:

    a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

    b. Maintain an inventory of spare parts.

    c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

    d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.
    (9 VAC 5-80-110, 9 VAC 5-50-20 E, and Condition 35 of NSR permit dated 11/08/2002

B. Monitoring

1. **Catalytic incinerator for Production Center:** Each chamber of the catalytic incinerator (CI-1) shall be equipped with a device to continuously measure and record the inlet and outlet temperature to and from the catalyst bed. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times the catalytic incinerator is operating. Any 1-hour average inlet temperature below 600 EF shall be noted as an excursion. Any 1-hour average outlet temperatures above 1200 EF shall be noted as an excursion. All noted excursions shall require immediate maintenance on the catalytic incinerator to return the inlet and/or outlet temperature to within its normal range of readings. All 1-hour average temperature excursions shall be considered a permit violation.
   (9 VAC 5-80-110)

2. **Catalytic incinerator for Technical Center:** Each chamber of the catalytic incinerator (CI-2) shall be equipped with a device to continuously measure and record the inlet and outlet temperature to and from the catalyst bed. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times the catalytic incinerator is operating. Any 1-hour average inlet temperature below 550 EF shall be noted as an excursion. Any 1-hour average outlet temperature above 1200 EF shall be noted as an excursion. All noted temperature excursions shall require immediate maintenance on the catalytic incinerator to return the inlet and/or outlet temperature to within its normal range of readings. All 1-hour average temperature excursions shall be considered as a permit violation.
   (9 VAC 5-80-110)

3. **Monitoring RGP 1-3 emissions:** From a material balance of all products used by the three packaging rotogravure presses (RGP 1-3) and Material Safety Data Sheet (MSDS) for the products, the permittee shall calculate the monthly and annual throughput of VOC materials and the VOC emissions, except as required by Conditions III.B.3.a, to demonstrate compliance with Conditions III.A.8 & 11. If VOC content is given as a range, the maximum value shall be used. The annual emissions are the sum of each consecutive 12-month period.
   (9 VAC 5-80-110)

a. If any monthly monitoring (as required in Condition III.B.3) indicates that VOC emissions for RGP 1-3 (combined) are equal to or greater than 50% of the allowable limit in Condition III.A.11, the VOC content of each VOC material used shall be determined the next calendar quarter using Reference Method 24 or 24A (40 CFR 60, Appendix A), and such determined VOC content shall be used for the purpose of calculating throughput and emissions. VOC content testing shall be conducted by the permittee or the supplier may provide a manufacturer's certificate of VOC content of the batch as supplied for each formulation of material received after such emissions threshold has been achieved. Each VOC material shipment received shall be clearly identified by a product formulation number which may be correlated to Method 24 or 24A test results. The most recent test results of VOC content for each formulation shall be used in emission calculations. Quarterly testing may be discontinued after actual VOC emissions are below 50% of the allowable limit in Condition III.A.11 for three consecutive months. If quarterly testing is discontinued, the VOC content determined in the latest test or manufacturer's certificate for each formulation may be used in lieu of the MSDS value in throughput and emission calculations.
(9 VAC 5-80-110)

4. **Monitoring C 1 & 2:** From a material balance of all products used by the two coaters (C 1 & 2) and Material Safety Data Sheet (MSDS) for the products, the permittee shall calculate the monthly and annual throughput of VOC materials and the VOC emissions, except as required by Conditions III.B.4.a, to demonstrate compliance with Conditions III.A.12. If VOC content is given as a range, the maximum value shall be used. The annual emissions are the sum of each consecutive 12-month period.

   (9 VAC 5-80-110)

a. If any monthly monitoring (as required in Condition III.B.4) indicates that VOC emissions for C 1 & 2 are equal to or greater than 50% of the allowable limit in Condition III.A.12, the VOC content of each VOC material used shall be determined the next calendar quarter using Reference Method 24 or 24A (40 CFR 60, Appendix A) and such determined VOC content shall be used for the purpose of calculating throughput and emissions. VOC content testing shall be conducted by the permittee or the supplier may provide a manufacturer's certificate of VOC content of the batch as supplied for each formulation of material received after such emissions threshold has been achieved. Each VOC material shipment received shall be clearly identified by a product formulation number which may be correlated to Method 24 or 24A test results. The most recent test results of VOC content for each formulation shall be used in the emission calculations. Quarterly testing may be discontinued after actual coating VOC emissions are below 50% of the allowable limit in Condition III.A.12 for three consecutive months. If quarterly testing is discontinued, the VOC content determined in the latest test or manufacturer's certificate for each formulation may be used in lieu of the MSDS value in throughput and emission calculations.
(9 VAC 5-80-110)

5. **Monitoring RGP 4:** From a material balance of all products used by the rotogravure (RGP 4) in the Technical Center and Material Safety Data Sheet (MSDS) for the products, the permittee shall calculate the monthly and annual throughput of VOC materials and the VOC emissions, except as required by Conditions III.B.5.a, to demonstrate compliance with Conditions III.A.13. If VOC content is given as a range, the maximum value shall be used. The annual emissions are the sum of each consecutive 12-month period.

   (9 VAC 5-80-110)

a. If any monthly monitoring (as required in Condition III.B.5) indicates that VOC emissions for RGP 4 are equal to or greater than 50% of the allowable limit in Condition III.A.13, the VOC content of each VOC material used shall be determined the next calendar quarter using Reference Method 24 or 24A (40 CFR 60, Appendix A) and such determined VOC content shall be used for the purpose of calculating throughput and emissions. VOC content testing shall be conducted by the permittee or the supplier may provide a manufacturer's certificate of VOC content of the batch as supplied for each formulation of material received after such emissions threshold has been achieved. Each VOC material shipment received shall be clearly identified by a product formulation number which may be correlated to Method 24 or 24A test results. The most recent test results of VOC content for each formulation shall be used in the emission calculations. Quarterly testing may be discontinued after actual coating VOC emissions are below 50% of the allowable limit in Condition III.A.13 for three consecutive months. If quarterly testing is discontinued, the VOC content determined in the latest test or manufacturer's certificate for each formulation may be used in lieu of the MSDS value in throughput and emission calculations.
(9 VAC 5-80-110)

6. **Monitoring Total Enclosures:** On a monthly basis, the permittee shall inspect each permanent total enclosure for the four packaging rotogravure presses (RGP 1-4) and two coaters (C 1 & 2) and note any changes that have been made since the last permanent total enclosure certification was conducted.
(9 VAC 5-80-110)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

a. The yearly throughput of materials and generated VOCs and HAPS (from the inks, coatings, thinners, cleaners) for the three packaging rotogravure presses (RGP 1-3) combined, calculated monthly as the sum of each consecutive 12-month period,

b. The yearly throughput of materials and generated VOCs and HAPS for the two coating machines (C 1 & 2) combined, calculated monthly as the sum of each consecutive 12-month period,

c. The yearly throughput of materials and generated VOCs and HAPS (from the inks, coatings, thinners, cleaners) for the 13.5 inch packaging rotogravure press (RGP 4) in the tech center, calculated monthly as the sum of each consecutive 12-month period.

d. Material Safety Data Sheet for all materials used on the rotogravure presses (RGP 1-4) and coaters (C 1 & 2) that display the VOC % and HAPS by weight. All required Method 24/24A test results, or manufacturer's certificates of VOC and batch content as supplied.

e. Any requests by DEQ to shut down portions of the facility and the permittee's actions on such occurrences.

f. Maintenance schedule, spare parts list, maintenance records of scheduled and unscheduled maintenance, and training records.

g. Records of inlet and outlet clock hourly average temperatures for the catalytic incinerators;

h. Results from the monthly permanent total enclosure inspections.

i. The results of any conducted performance tests.

These records shall be kept at the facility, made available for inspection by the DEQ, and shall be current for the most recent five years.
(9 VAC 5-80-110, 9 VAC 5-50-50, and Condition 29 of NSR permit dated 11/08/2002)

D. Testing

1. **Testing -** The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30 F, 9 VAC 5-80-110, and Condition 13 of NSR permit dated 11/08/2002)

2. **Stack Test -** Initial performance tests shall be conducted on the Production Center catalytic incinerator and capture system for RGP-1 to determine compliance with the control efficiency requirements for VOCs contained in Conditions III.A.1 and III.A.6. If no initial performance tests under MACT operating scenario # 2 have been performed while the new (JOSH) Gravure Press # 1 is operating (Condition VII.D.1), the tests shall be performed and demonstrate compliance within 60 days after achieving the maximum production rate on the new (JOSH) Gravure Press # 1 but in no event later than 180 days after start-up of the new (JOSH) Gravure Press # 1. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests are to be arranged with the Director, Tidewater Regional Office.
(9 VAC 5-80-110, 9 VAC 5-50-30, 9 VAC 5-80-1200, and Condition 28 of NSR permit dated 11/08/2002)

3. **Stack Test -** If no testing has been accomplished under Condition VII.D.1, a performance test to demonstrate compliance with Condition III.A.4 shall be conducted on the permanent total enclosure and catalytic incinerator for the rotogravure press in the Technical Center within 90 days of the ending month upon the first time that the consecutive 12-month total VOC throughput to the packaging rotogravure press exceeds 100 tons. Only one performance test, based on this throughput trigger, is required before this permit is renewed if there is more than one occasion of the 12-month total VOC throughput to the packaging rotogravure press exceeding 100 tons.
(9 VAC 5-80-110)

4. **Testing -** A performance test to demonstrate compliance with Condition III.A.1 and/or A.4 shall be conducted within 90 days on any permanent total enclosures that have been modified to affect their status since the last permanent total enclosure certification was conducted.
(9 VAC 5-80-110)

5. **Testing -** If testing to demonstrate compliance is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method
VOC	EPA Methods 18, 25, 25a
Permanent Total Enclosure	EPA Method 204
VOC Content	EPA Methods 24, 24a
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

E. Reporting

1. Submit all proposed test protocols for the permanent total enclosures and performance test for the incinerators to DEQ at least 60 days prior to the proposed testing date.
(9 VAC 5-80-110, 9 VAC 5-50-30, 9 VAC 5-80-1200, and Condition 28 of NSR permit dated 11/08/2002)

2. Submit test results for permanent total enclosures and performance test for the incinerators to DEQ at least 60 days after testing has been completed.
(9 VAC 5-80-110, 9 VAC 5-50-30, 9 VAC 5-80-1200, and Condition 28 of NSR permit dated 11/08/2002)

3. The permittee shall furnish written notification of:

   a. The actual date on which construction of the new RGP-1 commenced, within 30 days after such date.

b. The anticipated start-up date of the new RGP-1, postmarked not more than 60 days nor less than 30 days prior to such date.

c. The actual start-up date of the new RGP-1, within 15 days after such date.

d. The anticipated date of performance tests of the new Gravure Press # 1 postmarked at least 30 days prior to such date.

e. A copy of a and c for RGP-1 shall be sent to:
Chief, Air Enforcement Branch (3AP13), U.S. EPA, Region III
ATTN: Subpart KK Coordinator
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-50-50 and 40 CFR 63, Subpart A § 63.9(a)(4)(ii) and § 63.9(b)(4)(iii and v), and Condition 30 of NSR permit dated 11/08/2002)

4. All reports will be sent to:
DEQ/TRO
5636 Southern Blvd.
Virginia Beach, VA 23462
(9 VAC 5-80-110)

IV. Lithographic Center (LP 1-3), NSR permit of 11/08/2002

A. Limitations

1. **Emission Controls -** Volatile organic compound (VOC) emissions from the three non-heat set sheetfed offset lithographic presses (LP 1-3) shall be controlled by the use of conventional inks (42% or less VOC by weight), UV inks, water based coatings (10% or less VOC by weight), and isopropyl alcohol fountain solution at 10% or less VOC by weight. A change in inks, coatings, or fountain solution may require a permit to modify and operate. The printing presses shall be provided with adequate access for inspection.
(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 11 of NSR dated 11/08/2002)

2. **Throughput** - The throughput of conventional offset inks for the three sheetfed offset lithographic presses (LP 1-3) shall not exceed 1474.2 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 17 of NSR dated 11/08/2002)

3. **Throughput** - The throughput of press/roller/blanket wash for the three sheetfed offset lithographic presses (LP 1-3) shall not exceed 30.9 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 18 of NSR dated 11/08/2002)

4. **Throughput** - The throughput of UV washes for LP-1 and LP-3 shall not exceed 8.8 tons per year, calculated monthly as the sum of each consecutive 12-month period. (9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 19 of NSR dated11/08/2002)

5. **Throughput** - The throughput of isopropyl alcohol added to the fountain solution for the three sheetfed offset lithographic presses (LP 1-3) shall not exceed 50.5 tons per year, calculated monthly as the sum of each consecutive 12-month period. (9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 20 of NSR dated 11/08/2002)

6. **Throughput** - The throughput of water based (acrylic) coating for the three sheetfed offset lithographic presses (LP 1-3) shall not exceed 839.7 tons per year, calculated monthly as the sum of each consecutive 12-month period. (9 VAC 5-80-110, 9 VAC 5-80-1180, and Condition 21 of NSR dated 11/08/2002)

7. **Emission Limits -** The products listed in Conditions IV.A 2 through 6 can be used along with UV inks in any combination during the year such that emissions from the operation of the three sheetfed offset lithographic presses (LP 1-3 combined) shall not exceed the limits specified below:

Volatile Organic Compounds	109.0 ton/yr

   (9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 25 of NSR dated 11/08/2002)

8. **Emission Controls -** In the Litho Center, the permittee shall take all reasonable precautions with press operations and the handling, transportation, and storage of the printing input materials at the facility in order to minimize the duration and frequency of excess emissions. (9 VAC 5-80-110, 9 VAC 5-80-10 H, and Condition 12 of NSR dated 11/08/2002)

B. Monitoring

1. From a material balance of all products used by the three lithographic presses (LP 1-3) and Material Safety Data Sheets (MSDS) for the products, the permittee shall calculate the monthly and annual throughput of VOC emissions, except as required by Condition IV.B.2 to demonstrate compliance with Condition IV.A.7. If VOC contents are given as a range, the maximum value shall be used. The annual emissions are the sum of each consecutive 12-month period.

   (9 VAC 5-80-110)

2. If any monthly monitoring (as required in Condition IV.B.1) indicates that VOC emissions are equal to or greater than 50% of the allowable limit in Condition IV.7, the VOC content of each VOC material used shall be determined the next calendar quarter using Reference Method 24 or 24A (40 CFR 60, Appendix A) and such determined VOC content shall be used for the purpose of calculating throughput and emissions. VOC content testing shall be conducted by the permittee or the supplier may provide a manufacturer's certificate of VOC content of the batch as supplied for each formulation of material received after such emissions threshold has been achieved. Each VOC material shipment received shall be clearly identified by a product formulation number which may be correlated to Method 24 or 24A test results. The most recent test results of VOC content for each formulation shall be used in the emission calculations. Quarterly testing may be discontinued after actual coating VOC emissions are below 50% of the allowable limit in Condition IV.A.7 for three consecutive months. If quarterly testing is discontinued, the VOC content determined in the latest test or manufacturer's certificate for each formulation may be used in lieu of the MSDS value in throughput and emission calculations.
(9 VAC 5-80-110)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

a. The yearly throughput (in tons) of the following items for the Litho Center:
   - conventional offset inks;
   - press/roller/blanket wash;
   - UV wash;
   - isopropyl alcohol;
   - water based (acrylic) coatings;

   yearly is calculated monthly as the sum of each consecutive 12-month period.

b. Material Safety Data Sheets for materials used by the presses in the Litho Center that display the VOC and HAPS % by weight for all the materials used in the presses. All required Method 24/24A test results or manufacturer's certificates of VOC batch content as supplied.

c. Yearly VOC and HAPS emissions shall be calculated monthly for the conventional inks, press/roller/blanket wash, UV wash, isopropyl alcohol, and water based (acrylic) coatings used by the three litho presses (LP 1-3 combined), calculated monthly as the sum of each consecutive 12-month period to show compliance with Condition IV.A.7.

These records shall be kept at the facility, made available for inspection by DEQ, and shall be current for the most recent five years.
(9 VAC 5-80-110, 9 VAC 5-50-50, and Condition 29 of NSR permit dated 11/08/2002)

D. Testing

If testing to demonstrate compliance is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method
VOC Content	EPA Methods 24/ 24a

(9 VAC 5-80-110)

V. Facility Wide, NSR permit of 11/08/2002

A. Limitations

The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-80-110, 9 VAC 5-20-180 I, and Condition 37 of NSR permit dated 11/08/2002)

B. Monitoring/Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

1. Requests by DEQ to reduce level of operations or shut down the facility to avoid violating any primary ambient air quality standard and the permittee's actions.

2. Notifications of the permittee's intention to shut down or bypass, or both, air pollution control equipment for necessary scheduled maintenance, which results in excess emissions for more than one hour.

These records shall be kept at the facility, made available for inspection by DEQ, and shall be current for the most recent five years.
(9 VAC 5-80-110)

C. Reporting

1. The permittee shall furnish notification to the Director, Tidewater Regional Office of the intention to shut down or bypass, or both, air pollution control equipment for necessary scheduled maintenance, which results in excess emissions for more than one hour, at least 24 hours prior to the shutdown. The notification shall include, but is not limited to, the following information:

   a. Identification of the air pollution control equipment to be taken out of service, as well as its location, and registration number;

   b. The expected length of time that the air pollution control equipment will be out of service;

   c. The nature and quantity of emissions of air pollutants likely to occur during the shutdown period;

   d. Measures that will be taken to minimize the length of the shutdown or to negate the effect of the outage.

   (9 VAC 5-80-110, 9 VAC 5-20-180 B, and Condition 36 of NSR permit date 11/08/2002)

2. All reports will be sent to:

   DEQ/TRO
   5636 Southern Blvd.
   Virginia Beach, VA 23462

   (9 VAC 5-80-110)

VI. Production Center/Technical Center – (RGP 1-4), SCENARIO #1 for MACT--Subpart A and KK

A. Limitations

1. The four rotogravure presses (RGP 1-4) shall apply no more than 400 kg (881.8 lbs) per month of organic hazardous air pollutants (HAP).
(9 VAC 5-80-110 and 40 CFR 63, Subpart KK, § 63.821(b) ,§ 63.821(b)(2), and Condition 50 of NSR permit dated 11/08/2002)

2. If the four rotogravure presses (RGP 1-4) apply more than 400 kg (881.8 lbs) of organic HAP for any month, then scenario # 2 for MACT Subpart A and KK must be used for that month and all following months. Once the permittee has gone to scenario # 2 for MACT Subpart A and KK, it can not return to scenario # 1 for MACT Subpart A and KK even if the monthly applied organic HAP is equal to or less than 400 kg (881.8 lbs).
(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 63.821(c), and Condition 51 of NSR permit dated 11/08/2002)

B. Monitoring/Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Region. These records shall include, but are not limited to:

1. Monthly total volume and organic HAP content of each material applied by the four rotogravure presses (RGP 1-4).

2. The monthly total organic HAP applied by the four rotogravure presses (RGP 1-4) to demonstrate compliance with Condition VI.A.1.

3. The records of initial notification to DEQ and EPA, Region III of affected source for existing source start-up prior to compliance date of 40 CFR 63, Subpart KK.

These records shall be kept at the facility, made available for inspection by DEQ, and shall be current for the most recent five years.
(9 VAC 5-80-110 and 40 CFR 63, Subpart KK, § 63.821(b), § 63.829(e), § 63.829(e)(2), and § 63.830(b)(1)(i, iii, & -iv), 40 CFR 63, Subpart A, § 63.9(b), and Condition 52 of NSR permit dated 11/08/2002)

C. Testing

If testing to demonstrate compliance is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method
HAP Content	EPA Methods 311

(9 VAC 5-80-110 and Condition 53 of NSR permit dated 11/08/2002))

D. Reporting

1. The permittee shall submit, upon request by the DEQ, the records required by Condition VI.B.1 & 2 to Director, Tidewater Region.
(9 VAC 5-80-110 F and 40 CFR 63, Subpart KK, § 63.821(b), § 63.829(e), and Condition 54 of NSR permit dated 11/08/2002)

2. All reports will be sent to:

   DEQ/TRO
   5636 Southern Blvd.
   Virginia Beach, VA 23462

   (9 VAC 5-80-110 F and 40 CFR 63, Subpart KK, § 63.821(b), § 63.829(e), and Condition 54 of NSR permit dated 11/08/2002)

VII. Production Center/Technical Center – (RGP 1-4), SCENARIO #2 for MACT--Subpart A and KK

A. Limitations

1. The HAP emissions for the four rotogravure presses (RGP 1-4) shall not be more than five percent of the organic HAP applied for the month. This shall be accomplished by operating capture and control devices for the three rotogravure presses (RGP 1-3) in the Production Center that shall have an overall control efficiency of at least 95% for organic HAP for each month and by operating capture and control devices for the one rotogravure press (RGP 4) in the Technical Center that shall have an overall control efficiency of at least 95% for organic HAP for each month.
(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 68.825(b), § 68.825(b)(7)), § 68.825(h), § 68.825(h)(3), and Condition 55 of NSR permit dated 11/08/2002)

2. The total permanent enclosures used in the Production Center and Technical Center to control presses RGP 1-4 shall meet the following criteria:

   a. Any natural draft openings shall be at least 4 equivalent opening diameters from each VOC emitting point;

   b. The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;

   c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure.

   d. All access doors and windows shall be closed during routine operation of the presses when HAPs are being applied.
   (9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 68.825(h)(3), and Condition 56 of NSR permit dated 11/08/2002)

3. All access doors and windows that could interfere with the total encloses meeting the requirements in Condition VII.A.2 shall be closed during routine operation of the presses when HAPs are being applied.
(9 VAC 5-60-100, 40 CFR 63, Subpart KK, § 68.825(h)(3), and Condition57 of NSR permit dated 11/08/2002))

4. Each chamber of the catalytic incinerator (CI-1) for the Production Center shall maintain a minimum inlet temperature of 600 EF and a retention time of 0.34 seconds. The catalytic incinerator shall be equipped with devices to continuously measure temperature before and after the catalyst bed and the pressure drop across the catalyst bed. The maximum outlet temperature from the catalyst bed shall not exceed 1200 EF. The permittee shall maintain records of the manufacturer's recommendations for catalyst bed replacement and records of actual catalyst bed replacement.
(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 68.825(h)(3), and Condition 58 of NSR permit dated 11/08/2002)

5. The catalytic incinerator (CI-2) for the Technical Center shall maintain a minimum inlet temperature of 550 EF and a retention time of 0.20 seconds. The catalytic incinerator shall be equipped with devices to continuously measure temperature before and after the catalyst bed and the pressure drop across the catalyst bed. The maximum outlet temperature from the catalyst bed shall not exceed 1200 EF. The permittee shall maintain records of the manufacturer's recommendations for catalyst bed replacement and records of actual catalyst bed replacement.
(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 68.825(h)(3), and Condition 59 of NSR permit dated 11/08/2002)

6. At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain the rotogravure presses (RGP 1-4), including associated air pollution control equipment and continuous monitoring system (CMS), in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.
(9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.6(e)(1)(i), 63.6(e)(3)(ii) and § 63.8 (c)(1), and Condition 60 of NSR permit dated 11/08/2002)

7. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the start-up, shutdown, and malfunction plan required in Condition VII.A.8.
(9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.6(e)(1)(ii) and § 63.8 (c)(1)(i), and Condition 61 of NSR permit dated 11/08/2002)

8. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.
(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 68.6(e)(1)(iii), and Condition 62 of NSR permit dated 11/08/2002)

9. The permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining and a program of corrective action for the rotogravure presses (RGP 1-4), including associated air pollution control equipment used to comply with the relevant standard and continuous monitoring system (CMS), during periods of startup, shutdown, and malfunction. The plan shall include the identification of all routine or otherwise predictable process, air pollution control and CMS equipment malfunctions. The purpose of the startup, shutdown, and malfunction plan is to:

    a. Ensure that, at all times, the permittee operates and maintains the rotogravure presses (RGP 1-4), including associated air pollution control equipment and CMS, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards;

    b. Ensure that the permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of hazardous air pollutants. This includes keeping the necessary parts readily available for repairs identified for predictable malfunctions of process, air pollution control, and CMS equipment.

    c. Reduce the reporting burden associated with periods of startup, shut-down, and malfunction (including corrective action taken to restore malfunctioning process, associated air pollution control, and CMS equipment to its normal or usual manner of operation).

    d. To satisfy the requirements of this permit to develop a startup, shutdown, and malfunction plan, the owner or operator may use the rotogravure presses (RGP 1-4), the associated air pollution control equipment, and continuous monitoring system (CMS), standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of the requirements listed above.

    (9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.6(e)(3)(i), § 63.6(e)(3)(vi), § 63.8 (c)(1)(i), § 63.8(d)(2)(vi), and Condition 63 of NSR permit dated 11/08/2002)

10. The permittee shall not fail to provide notifications, reports, or revisions of such as required in Condition VII.E.
    (9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.4(a)(ii), and Condition 64 of NSR permit dated 11/08/2002)

B. Monitoring

1. Monitoring shall be conducted as set forth in this section unless the DEQ specifies or approves the use of minor changes in methodology for the specified monitoring requirements and procedures.
(9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.8(b)(1) and(b)(1)(i), and Condition 65 of NSR permit dated 11/08/2002)

2. Catalytic incinerator for Production Center: The permittee shall install, calibrate, operate, and maintain each chamber of the catalytic incinerator (CI-1) with a temperature continuous monitoring system (CMS) to measure and record the inlet and outlet temperature to and from the catalyst bed. The temperature device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times RGP-1 or RGP-2 or RGP 3 is operating.

   a. Any 3-hour average inlet temperature below 600 EF shall be noted as an excursion. Any 3-hour average outlet temperature above 1200 EF shall be noted as an excursion. All noted excursions shall require immediate maintenance on the catalytic incinerator to return the inlet and/or out temperature to within its normal range of readings. All 3-hour average temperature excursions shall be considered a permit violation of Condition VII.A.1.

   b. The temperature CMS shall be capable of monitoring temperature with an accuracy of ±1 percent of the temperature being monitored in °C or ±1 °C, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet and outlet to obtain a representative temperature value.

   c. The temperature CMS shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the owner or operator chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

   d. The permittee shall develop and implement a quality control program for the temperature CMS. Each quality control program shall include, at a minimum, a written protocol that describes procedures for each of the following operations:

      (1) Initial and any subsequent calibration of the CMS;

      (2) Preventive maintenance of the CMS, including spare parts inventory;

      (3) Data recording, calculations, and reporting;

(4) Accuracy audit procedures, including sampling and analysis methods.

e. All temperature CMS equipment shall be installed, operational, and the data verified prior to or in conjunction with conducting performance tests under Condition VII.D.1**.** Verification of operational status shall, at a minimum, include completion of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system.

(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 63.825(d)(1), § 63.825(d)(1)(x), §63.828(a)(4), §63.828(a)(2)(ii), §63.828(b), Subpart A, § 63.8(c)(2)) and(c)(3), § 63.8(d)(2), and Condition 66 of NSR permit dated 11/08/2002)

3. Catalytic incinerator for Technical Center: The permittee shall install, calibrate, operate, and maintain the catalytic incinerator (CI-2) with a temperature continuous monitoring system (CMS) to measure and record the inlet and outlet temperature to and from the catalyst bed. The temperature device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times RGP-4 is operating.

a. Any 3-hour average inlet temperature below 550 EF shall be noted as an excursion. Any 3-hour average outlet temperature above 1200 EF shall be noted as an excursion. All noted excursions shall require immediate maintenance on the catalytic incinerator to return the inlet and/or out temperature to within its normal range of readings. All 3-hour average temperature excursions shall be considered a permit violation of Condition VII.A.1.

b. The temperature CMS shall be capable of monitoring temperature with an accuracy of ±1 percent of the temperature being monitored in °C or ±1 °C, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet and outlet to obtain a representative temperature value.

c. The temperature CMS shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the owner or operator chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

d. The permittee shall develop and implement a quality control program for the temperature CMS. Each quality control program shall include, at a minimum, a written protocol that describes procedures for each of the following operations:

(1) Initial and any subsequent calibration of the CMS;

(2) Preventive maintenance of the CMS, including spare parts inventory;

(3) Data recording, calculations, and reporting;

(4) Accuracy audit procedures, including sampling and analysis methods.

e. All temperature CMS equipment shall be installed, operational, and the data verified prior to or in conjunction with conducting performance tests under Condition VII.D.1**.** Verification of operational status shall, at a minimum, include completion of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system

(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 63.825(d)(1), § 63.825(d)(1)(x), §63.828(a)(4), §63.828(a)(2)(ii), §63.828(b), and Subpart A, § 63.8(c)(2) and 63.8(c)(3), § 63.8(d)(2), and Condition 67 of NSR permit dated 11/08/2002)

4. The permittee shall develop and submit to the DEQ a monitoring plan for each permanent total enclosure (PTE) for RGP 1-4 within 45 days of this scenario becoming effective. The permittee shall begin to conduct monitoring according to the PTE monitoring plan upon submittal to DEQ. DEQ may request changes to the plan upon review. Any excursions from the values set in the monitoring plan shall be considered a permit violation of Condition VII.A.1. The plan shall:

   a. Identify the operating parameter(s) and the range of values to be monitored to ensure that the PTE certified during the initial compliance performance test is maintained,

   b. Discuss why this parameter(s) is/are appropriate for demonstrating ongoing compliance, and

   c. Identify the specific monitoring procedures.

   (9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 63.825(d)(1), § 63.825(d)(1)(x), §63.828(a)(5), §63.828(a)(5)(i-iii), §63.828(b), and Condition 68 of NSR permit dated 11/08/2002)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters as necessary to demonstrate compliance with this permit and as required by 40 CFR 60, Subpart A and KK. The content and format of such records shall be arranged with the Director, Tidewater Region. These records shall include, but are not limited to:

1. If an action taken by the permittee during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the permittee's startup, shutdown, and malfunction plan, the permittee shall record the actions taken for that event.
   (9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 63.829(b) and § 63.829(b)(1), and 40 CFR 63, Subpart A, § 63.6(e)(iv)), § 63.10(b)(2)(iv),and Condition 68 of NSR permit dated 11/08/2002)

2. The permittee shall keep the written startup, shutdown, and malfunction plan on record after it is developed to be made available for inspection, upon request, by the DEQ for the life of the affected source or until the affected source is no longer subject to the provisions of this part. In addition, if the startup, shutdown, and malfunction plan is revised, the permittee shall keep previous (i.e., superseded) versions of the startup, shutdown, and malfunction plan on record, to be made available for inspection, upon request, by the DEQ for a period of 5 years after each revision to the plan.
(9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.6(e)(v), and Condition 69 of NSR permit dated 11/08/2002)

3. For a minimum of 5 years after a performance test is conducted on the RGP 1-4 and associated air pollution control equipment and performance, the permittee shall retain and make available, upon request, for inspection by the DEQ the records or results of such performance test and other data needed to determine emissions from the RGP 1-4.
(9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.7(g)(3), § 63.10(b)(2)(viii), and Condition 69 of NSR permit dated 11/08/2002)

4. The permittee shall maintain relevant records for RGP 1-4, associated air pollution equipment, and temperature CMSs of:

   a. The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);

   b. The occurrence and duration of each malfunction of the air pollution control equipment;

   c. All maintenance performed on the air pollution control equipment;

   d. All information necessary to demonstrate conformance with the permittee's source's startup, shutdown, and malfunction plan when all actions taken during periods of start-up, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a ''check-list,'' or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events);

   e. Each period during which a temperature CMS is malfunctioning or inoperative;

f. All required measurements needed to demonstrate compliance with the permit limitations (including, but not limited to, 3-hr averages of temperature CMS data, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report);

g. All results of temperature CMS performance evaluations;

h. All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;

i. All temperature CMS calibration checks;

j. All adjustments and maintenance performed on temperature CMS.

(9 VAC 5-80-110, 40 CFR, Subpart KK, § 63.829(b) and § 63.829(b)(1), 40 CFR 63, Subpart A, § 63.6(e) (3)(iii), § 63.10(b)(2)(i-iii), § 63.10(b)(2)(v-xi)), and Condition 69 of NSR permit dated 11/08/2002

5. Additional recordkeeping requirements for the permittee for each temperature CMS:

a. All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns);

b. The date and time identifying each period during which the CMS were inoperative;

c. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and temperature parameter monitoring exceedances, as defined in the permit, that occurs during startups, shutdowns, and malfunctions of the CMS;

d. The nature and cause of any malfunction (if known);

e. The corrective action taken or preventive measures adopted;

f. The nature of the repairs or adjustments to the CMS that was inoperative ;

g. The total process operating time during the reporting period; and

h. All procedures that are part of a quality control program developed and implemented for CMS.

i. In order to satisfy the requirements of Conditions VII.C.5.d-f and to avoid duplicative recordkeeping efforts, the permittee may use the startup, shutdown, and malfunction plan or records kept to satisfy the recordkeeping requirements of the startup, shutdown, and malfunction plan**,** provided that such plan and records adequately address the requirements of Conditions VII.C.5.d-f.

(9 VAC 5-80-110, 40 CFR, Subpart KK, § 63.829(b) and § 63.829(b)(3), 40 CFR 63, Subpart A, § 63.10(c)(1) and § 63.10(c)(7-15), and Condition 70 of NSR permit dated 11/08/2002)

6. The permittee shall keep the written CMS quality control procedures and CMS performance evaluation test plan on record for the life of the affected source or until the affected source is no longer subject to the provisions of this part, to be made available for inspection, upon request, by the DEQ. If the performance evaluation plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the performance evaluation plan on record to be made available for inspection, upon request, by the DEQ, for a period of 5 years after each revision to the plan.
(9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.8(d)(3), and Condition 71 of NSR permit dated 11/08/2002)

7. The permittee shall keep the permanent total enclosure monitoring plan and monitoring results.
(9 VAC 5-80-110, 40 CFR 63, Subpart KK, § 63.828(a)(5) and (a)(5)(i-iii), and Condition 72 of NSR permit dated 11/08/2002)

8. The permittee shall maintain files of all information (including all reports and notifications required by this permit) recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained at the facility. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
(9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.10(b)(1), and Condition 68 of NSR permit dated 11/08/2002)

D. Testing

1. An initial performance test for RPG 1-4 and the associated air pollution control equipment shall be conducted within 180 days after beginning operations under Scenario #2 to demonstrate the overall organic HAP control efficiency (R) is in compliance with Conditions VII.A.1. The overall organic HAP control efficiency, (R), is calculated using: R = E X F. E = capture efficiency. F = destruction efficiency
(9 VAC 5-80-110, 40 CFR, Subpart KK, § 63.825(d), § 63.825(d)(1), and § 63.825(d)(iii), and 40 CFR 63, Subpart A,§ 63.7(a)(2))

   a. Initial performance test to establish each catalytic incinerator destruction efficiency (E) and associated catalytic bed inlet/outlet temperature shall be conducted and data reduced in accordance with the following procedure:

      (1) Method 1 or 1A of 40 CFR part 60, appendix A is used for sample and velocity traverses to determine sampling locations.

      (2) Method 2, 2A, 2C, or 2D of 40 CFR part 60, appendix A is used to determine gas volumetric flow rate.

      (3) Method 3 of 40 CFR part 60, appendix A is used for gas analysis to determine dry molecular weight.

      (4) Method 4 of 40 CFR part 60, appendix A is used to determine stack gas moisture.

      (5) Methods 2, 2A, 3, and 4 of 40 CFR part 60, appendix A shall be performed, as applicable, at least twice during each test period.

      (6) Method 25 of 40 CFR part 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in Conditions VII.D.1.a.(6)(a–c). The permittee may use Method 25A of 40 CFR part 60, appendix A, if:

         (a) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with the limits of Condition VII.A.1, or

         (b) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less, or

(c) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

(7) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the RGP 1-4 are operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply. Upon receiving approval from the DEQ, results of a test run may be replaced with results of an additional test run in the event that:

(a) A sample is accidentally lost after the testing team leaves the site; or

(b) Conditions occur in which one of the three runs must be discontinued because of forced shutdown; or

(c) Extreme meteorological conditions occur; or

(d) Other circumstances occur that are beyond the permittee's control.

b. The owner or operator shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

c. For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For the catalytic incinerator in the Production Center, the permittee shall establish as close as possible the operating temperature of 600EF for the minimum gas temperature up-stream of the catalyst bed. For the catalytic incinerator in the Technical Center, the permittee shall establish as close as possible the operating temperature of 550EF for the minimum gas temperature up-stream of the catalyst bed. These minimum temperatures are the operating values that demonstrate continuing compliance with the requirements Condition VII.A.1.

d. Before conducting a required performance test, the permittee shall develop a site-specific test plan. The test plan shall include a test program summary, the test schedule, data quality objectives, and both an internal and external quality assurance (QA) program. Data quality objectives are the pretest expectations of precision, accuracy, and completeness of data.

(1) The internal QA program shall include, at a minimum, the activities planned by routine operators and analysts to provide an assessment of test data precision; an example of internal QA is the sampling and analysis of replicate samples.

(2) The external QA program shall include, at a minimum, application of plans for a test method performance audit (PA) during the performance test. The PA's consist of blind audit samples provided by the DEQ and analyzed during the performance test in order to provide a measure of test data bias. The external QA program may also include systems audits that include the opportunity for on-site evaluation by the DEQ of instrument calibration, data validation, sample logging, and documentation of quality control data and field maintenance activities.

(3) In the event that the DEQ fails to approve or disapprove the site-specific test plan within the 30 days from receipt, the following condition shall apply:

If the permittee intends to demonstrate compliance using the test method(s) specified in the relevant test plan, the permittee shall conduct the performance test within the time specified in Condition VII.D.1 using the specified method(s).

e. The owner or operator shall analyze performance audit (PA) samples during each performance test. If the DEQ fails to provide the required PA materials to the permittee in time to analyze the PA samples during a performance test, the requirement to conduct a PA under this paragraph shall be waived for that performance test. Waiver under this paragraph of the requirement to conduct a PA for a particular performance test does not constitute a waiver of the requirement to conduct a PA for future required performance tests.

f. Performance testing of facilities - For each required performance testing, the permittee shall provide performance testing facilities as follows:

(1) Sampling ports adequate for test methods applicable to such source. This includes:

(a) Constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures; and

(b) Providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures;

(2) Safe sampling platform(s);

(3) Safe access to sampling platform(s);

(4) Utilities for sampling and testing equipment; and

(5) Any other facilities that the DEQ deems necessary for safe and adequate testing of a source.

g. Performance tests shall be conducted under such conditions as the DEQ specifies to the owner or operator based on representative performance (i.e., performance based on normal operating conditions) of the RGP 1-4. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test, nor shall emissions in excess of the levels stated in Conditions VII.A1 during periods of startup, shutdown, and malfunction be considered a violation of the permit limits unless otherwise stated in the this permit or a determination of noncompliance is made under Condition VII.A.5. Upon request, the permittee shall make available to the DEQ such records as may be necessary to determine the conditions of performance tests.

h. Performance tests shall be conducted and data shall be reduced in accordance with the test methods and procedures set forth in this section and, if required, in applicable appendices of parts 40 CFR 51, 60, 61, and 63 unless the DEQ:

(1) Specifies or approves, in specific cases, the use of a test method with minor changes in methodology; or

(2) Approves shorter sampling times and smaller sample volumes when necessitated by process variables or other factors.

i. A performance test shall be conducted to determine the capture efficiency (F) of each capture system venting organic emissions to a control device shall be conducted by the permittee along with the performance test:

For permanent total enclosures, capture efficiency shall be assumed as 100 percent. Method 204 for Verification of a Permanent or Temporary Total Enclosure as found in appendix M to 40 CFR 51 shall be used to confirm that an enclosure meets the requirements for permanent total enclosure.

(9 VAC 5-80-110, 40 CFR 63, Subpart KK § 63.825(d), § 63.825(d)(1), § 63.827(d)(1)(i-iii), § 63.827(d)(1-3), § 63.827(e), § 63.827(e)(1), 40 CFR 63, Subpart A, § 63.7(a)(2),§ 63.7(a)(2)(iii), § 63.7(b)(2)(i), § 63.7(b)(2)(ii), §63.7(b)(2)(iii), § 63.7(b)(3)(ii), § 63.7(c)(4)(i), § 63.7(c)(4)(iii), § 63.7(d)(1-5), § 63.7(e)(1), § 63.7(e)(2), § 63.7(e)(2) (i &ii), § 63.7(e)(3) and (e)(3)(i-iii), and Condition 74 of NSR permit dated 11/08/2002)

2. The permittee shall conduct a performance evaluation for each catalytic incinerator temperature CMS during any required performance test when operating under Scenario #2.

a. Before conducting a required CMS performance evaluation, the permittee shall develop a site-specific performance evaluation test plan for DEQ approval. The performance evaluation test plan shall include the evaluation program objectives, an evaluation program summary, the performance evaluation schedule, data quality objectives, and both an internal and external QA program. Data quality objectives are the pre-evaluation expectations of precision, accuracy, and completeness of data.

b. The CMS internal QA program shall include, at a minimum, the activities planned by routine operators and analysts to provide an assessment of CMS performance. The external QA program shall include, at a minimum, systems audits that include the opportunity for on-site evaluation by the DEQ of instrument calibration, data validation, sample logging, and documentation of quality control data and field maintenance activities.

c. In the event that the DEQ fails to approve or disapprove the site-specific CMS performance evaluation test plan within 30 days from receipt the following conditions shall apply:

If the permittee intends to demonstrate compliance using the monitoring method(s) specified in the test plan, the permittee shall conduct the performance evaluation within the time specified in the test plan using the specified methods.

(9 VAC 5-80-110, 40 CFR 63, Subpart KK § 63.8(e)(3)(i-ii), 40 CFR 63, Subpart A§ 63.8(d)(2), § 63.8(e)(4), § 63.8(e)(3)(v), and (3)(v)(A), and Condition 75 of NSR permit dated 11/08/2002)

3. Nothing in Condition VII.D.1 of this permit shall be construed to abrogate the DEQ's authority to require testing under **section 114** of the Clean Air Act.
(9 VAC 5-80-110, 40 CFR 63, Subpart A § 63.7(e)(4), and Condition 76 of NSR permit dated 11/08/2002)

E. Reporting

1. Not withstanding time periods or postmark deadlines specified in this section for the submittal of information to the DEQ by permittee, or the review of such information by the DEQ, such time periods or deadlines may be changed by mutual agreement between the permittee and the DEQ. A permittee who wishes to request a change in a time period or postmark deadline for a particular requirement shall request the adjustment in writing as soon as practicable before the subject activity is required to take place. The permittee shall include in the request whatever information he or she considers useful to convince the DEQ that an adjustment is warranted.
(9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.1(a)(12), § 63.9(i)(2), § 63.10(a)(5), and Condition 77 of NSR permit dated 11/08/2002)

2. Performance test and performance evaluation reporting/notifications:

   a. The permittee shall notify and submit the test plans to the DEQ in writing of the intention to conduct a performance test and CMS performance evaluation at least 60 calendar days before the tests are scheduled to begin to allow the DEQ to review and approve the site-specific test plans and to have an observer present during the tests. Observation of the performance tests by the DEQ is optional. (9 VAC 5-80-110 F, 40 CFR 63, Subpart KK § 63.830(b)(2), § 3.827(d)(1)(vi), Subpart A § 63.7(b)(1), § 63.7(b)(2)(iv),§ 63.8 (d)(2), § 63.8 (e)(2), § 63.8 (e)(3)(i & iii), § 63.9(e), § 63.9(g), and Condition 78 of NSR permit dated 11/08/2002)

   b. The permittee shall request from DEQ the performance audit materials for the performance test 45 days prior to the test date.
   (9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.7(b)(4)(i), and Condition 78 of NSR permit dated 11/08/2002)

   c. In the event the permittee is unable to conduct the performance test on the date specified in the notification of this section, due to unforeseeable circumstances beyond his or her control, the permittee shall notify the DEQ within five days prior to the scheduled performance test date and specify the date when the performance test is rescheduled. This notification of delay in conducting the performance test shall not relieve the owner or operator of legal responsibility for compliance with any other applicable provisions of this permit or with any other applicable Federal, State, or local requirement, nor will it prevent the DEQ from implementing or enforcing this permit or taking any other action under the Clean Air Act.
   (9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.7(b)(2), and Condition 78 of NSR permit dated 11/08/2002)

   d. Unless otherwise specified in the test method, or as otherwise approved by the DEQ in writing, results of the performance test shall include the analysis of samples, determination of emissions, and raw data. A performance test is ‘‘completed’’ when field sample collection is terminated. The permittee shall report the results of the performance test and CMS performance evaluation to the DEQ before the close of business on the 60th day following the completion of the performance test, unless as approved otherwise in writing by the DEQ. Along with the test results, the permittee shall submit the permanent total enclosure monitoring plan.
   (9 VAC 5-80-110 F 40 CFR 63, Subpart KK § 63.830(b)(3 &4), 40 CFR 63, Subpart A § 63.7(g)(1),§ 63.8(e)(5)(i), § 63.9(h)(3), § 63.10(d)(2), § 63.10(e)(2)), § 63.828(a)(5), and Condition 79 of NSR permit dated 11/08/2002)

3. Startup, shutdown, and malfunction reporting:

   a. All failures/malfunctions reports of process equipment or air pollution control equipment that may cause excess emissions for more than one hour must follow the requirements of Condition XI. F.
   (9 VAC 5-80-110 F, and Condition 80 of NSR permit dated 11/08/2002)

   b. Normal startup, shutdown, and malfunction reports: If failures/malfunctions do not qualify for Condition XI.F and all actions taken by the permittee during a startup, shutdown, or malfunction of the RGP 1-4 (including actions taken to correct a malfunction) are consistent with the procedures specified in the permittee's startup, shutdown, and malfunction plan, the permittee shall state such information in a startup, shutdown, and malfunction report as part of the report outlined in Condition XI.C. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report shall consist of a letter, containing the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy. This separate report is not needed if all the required information is included in the Summary Report required by Condition VII.E.5.
   (9 VAC 5-80-110 F, 40 CFR 63, Subpart KK § 63.830(b)(5)(i & ii), 40 CFR 63, Subpart A § 63.6(iii), § 63.8 (c)(1)(i), § 63.10(d)(5)(i), and Condition 80 of NSR permit dated 11/08/2002)

   c. Immediate startup, shutdown, and malfunction reports: Any time an action taken by the permittee during a startup, shutdown, or malfunction not qualifying for Condition XI.F (including actions taken to correct a malfunction) and is not consistent with the procedures specified in the permittee's startup, shut-down, and malfunction plan, the permittee shall report the actions taken for that event within two working days after commencing actions inconsistent with the plan followed by a letter within seven working days after the end of the event. The immediate report required under this paragraph shall consist of a telephone call (or facsimile (FAX) transmission) to the DEQ within two working days after commencing actions inconsistent with the plan, and shall be followed by a letter, delivered or postmarked within seven working days after the end of the event, that contains the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the startup, shut-down, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.
   (9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.6(e)(iv), § 63.10(d)(5)(ii), and Condition 80 of NSR permit dated 11/08/2002)

d. Immediate startup, shutdown, and malfunction reports: For those malfunctions or other events that affect the CMS and are not addressed by the startup, shutdown, and malfunction plan, the permittee shall report actions that are not consistent with the startup, shutdown, and malfunction plan within 24 hours (a telephone call or facsimile (FAX) transmission)) to the DEQ after commencing actions inconsistent with the plan. The permittee shall send a follow-up report within two weeks after commencing actions inconsistent with the plan that either certifies that corrections have been made or includes a corrective action plan and schedule. The owner or operator shall provide proof that repair parts have been ordered or any other records that would indicate that the delay in making repairs is beyond his or her control.
(9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.8(c)(1)(ii), and Condition 81 of NSR permit dated 11/08/2002)

4. Full excess emissions and continuous monitoring system performance reports shall be submitted semi-annually with the report required by Condition XI.C. This shall include:

a. Name, title, and signature of the responsible official who is certifying the accuracy of the report;

b. The date and time identifying each period during which the CMS was inoperative;

c. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and temperature parameter monitoring exceedances, as defined in the permit, that occurs during startups, shutdowns, and malfunctions of the CMS;

d. The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the permit, that occurs during periods other than startups, shutdowns, and malfunctions of the CMS;

e. The nature and cause of any malfunction (if known);

f. The corrective action taken or preventive measures adopted;

g. The nature of the repairs or adjustments to the CMS that was inoperative ;

h. The total process operating time during the reporting period;

i. When no excess emissions or exceedances of a parameter have occurred, or a CMS has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

(9 VAC 5-80-110 F, 40 CFR 63, Subpart KK §63.830(b)(3), 40 CFR 63, Subpart A § 63.9(h)(3), § 63.10(e)(3)(i & v), and Condition 82 of NSR permit dated 11/08/2002)

5. Summary report: one summary report for the hazardous air pollutants monitored from RPG 1-4 shall be submitted semi-annually with the report required by Condition XI.C. The summary report shall be entitled, ‘‘Summary Report—Gaseous Excess Emission and Continuous Monitoring System Performance’’ and shall contain the following information:

   a. The company name and address of the permittee;

   b. An identification of each hazardous air pollutant monitored at the affected source;

   c. The beginning and ending dates of the reporting period;

   d. A brief description of the process units;

   e. The emission and temperature CMS operating parameter limitations specified in this permit and permanent total enclosure (PTE) operating parameter(s) limitations specified in the PTE monitoring plan;

   f. The CMS monitoring equipment manufacturer(s) and model number(s);

   g. The date of the latest CMS certification or audit;

   h. The total operating time of the affected source during the reporting period;

   i. An emission data summary, including:

      (1) The total duration of excess emissions during the reporting period (recorded in minutes hours for gases),

      (2) The total duration of excess emissions expressed as a percent of the total source operating time during that reporting period,

      (3) And a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

   j. A CMS performance summary including:

      (1) The total CMS down-time during the reporting period (recorded hours for gases);

      (2) The total duration of CMS downtime expressed as a percent of the total source operating time during that reporting period;

(3) And a break-down of the total CMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes.

k. A description of any changes in CMS, processes, or controls since the last reporting period;

l. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and

m. The date of the report.

(9 VAC 5-80-110 F, 40 CFR 63, Subpart KK §63.830(b)(3), §63.830(b)(6), 40 CFR 63, Subpart A § 63.9(h)(3), § 63.10(e)(3)(i & vi), and Condition 83 of NSR permit dated 11/08/2002)

6. If the total duration of excess emissions for the reporting period is less than 1 percent of the total operating time for the reporting period, and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report shall be submitted, and the full excess emissions and continuous monitoring system performance report need not be submitted.

   (9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.10(e)(3)(vi), and Condition 84 of NSR permit dated 11/08/2002)

7. If the total duration of excess emissions exceedances for the reporting period is 1 percent or greater of the total operating time for the reporting period, or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, both the summary report and the full excess emissions and continuous monitoring system performance report shall be submitted.
   (9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.10(e)(3)(viii), and Condition 85 of NSR permit dated 11/08/2002)

8. Changes in information already provided to DEQ: Any change in the information already provided under this section shall be provided to the DEQ in writing within 15 calendar days after the change.
   (9 VAC 5-80-110 F, 40 CFR 63, Subpart A § 63.9(j), and Condition 86 of NSR permit dated 11/08/2002)

9. The permittee shall submit to DEQ the monitoring plan for each permanent total enclosure (PTE) for RGP 1-4 within 45 days of this scenario becoming effective.
   (9 VAC 5-80-110 F, 40 CFR 63, Subpart KK§63.828(a)(5), and Condition 74 of NSR permit dated 11/08/2002)

10. All reports will be sent to:

    DEQ/TRO
    5636 Southern Blvd.
    Virginia Beach, VA 23462
    With a copy of items VII.E.1, 2.a, 2.b, 4, and 5 to:
    Chief, Air Enforcement Branch (3AP13), U.S. EPA, Region III
    ATTN. Subpart KK Coordinator
    1650 Arch Street
    Philadelphia, PA 19103-2029

    (9 VAC 5-80-110 F, 40 CFR 63, Subpart A§63.9(a)(4)(ii)), and Condition 88 of NSR permit dated 11/08/2002)

VIII. Facility Wide, for MACT--Subpart A and KK

A. Limitations

1. No owner or operator of an affected source subject to 40 CFR 63, Subpart A in Virginia, who has a title V permit, shall operate such source except in compliance with the provisions of 40 CFR 63, Subpart A and the applicable requirements of the title V permit program in Virginia.
(9 VAC 5-80-110,and 40 CFR 63, Subpart A § 63.4(a)(3), and Condition 42 of NSR permit dated 11/08/2002)

2. An owner or operator of an affected source subject to 40 CFR 63, Subpart KK shall comply with the requirements of 40 CFR 63, Subpart KK by May 30, 1999, regardless of whether:

   a. A title V permit has been issued to that source; or

   b. If a title V permit has been issued to that source, whether such permit has been revised or modified to incorporate the emission standard.

   (9 VAC 5-80-110, 40 CFR 63, Subpart A § 63.4(a)(5), Subpart KK § 63.826(a), and Condition 43 of NSR permit dated 11/08/2002)

3. No owner or operator of an affected source subject to the provisions of 40 CFR 63, Subpart A and 40 CFR 63, Subpart KK shall build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. Such concealment includes, but is not limited to:

   a. The use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere;

   b. The use of gaseous diluents to achieve compliance with a relevant standard for visible emissions; and

   c. The fragmentation of an operation such that the operation avoids regulation by a relevant standard.

   (9 VAC 5-80-110, 40 CFR 63, Subpart A § 63.4(b), and Condition 44 of NSR permit dated 11/08/2002)

4. Notwithstanding any requirements incorporated into a title V permit obtained by the permittee subject to the provisions of 40 CFR 63, Subpart A and 40 CFR 63, Subpart KK, the provisions of 40 CFR 63, Subpart A and 40 CFR 63, Subpart KK are federally enforceable.
(9 VAC 5-80-110, 40 CFR 63, Subpart A § 63.4(c), and Condition 45 of NSR permit dated 11/08/2002)

5. The permittee may not reconstruct the affected source subject to 40 CFR 63, Subpart KK, or reconstruct the source such that the source becomes a major affected source subject to another 40 CFR 63 Subpart standard, without obtaining written approval, in advance, from the DEQ.
(9 VAC 5-80-110, 40 CFR 63, Subpart A § 63.5(b)(3), and Condition 46 of NSR permit dated 11/08/2002)

B. Monitoring/Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Region. These records shall include, but are not limited to:

1. Construction/reconstruction approval requests.
(9 VAC 5-80-110 and Condition 47 of NSR permit dated 11/08/2002)

2. An owner or operator of a stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants who determines that the source or part of the source is not subject to a relevant standard or other requirement established under 40 CFR 63 shall keep a record of the applicability determination as specified:

   If an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants is not subject to a relevant standard or other requirement established under 40 CFR 63, the owner or operator shall keep a record of the applicability determination on site at the source for a period of five years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) shall be sufficiently detailed to allow the DEQ to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis shall be performed in accordance with requirements established in subparts of 40 CFR 63 part for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with EPA guidance materials published to assist sources in making applicability determinations under section 112, if any.
   (9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.1(b)(3), § 63.10(b)(3), and Condition 47 of NSR permit dated 11/08/2002)

3. The permittee shall maintain files of all information (including all reports and notifications required by this permit) recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained at the facility. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
(9 VAC 5-80-110, 40 CFR 63, Subpart A, § 63.10(b)(1), and Condition 47 of NSR permit dated 11/08/2002)

C. Reporting

1. The permittee shall submit to the DEQ an application for approval of the reconstruction of a major affected source subject to 40 CFR 63, Subpart KK. The application shall be submitted as soon as practicable and well in advance of the reconstruction planned commencement date in order for the timely review and approval by the DEQ so that the planned commencement date will not be delayed. A separate application shall be submitted for each reconstruction. Each application for approval of reconstruction shall include at a minimum:

   a. The applicant's name and address;

   b. A notification of intention to make any physical or operational change to a major affected source that may meet or has been determined to meet the criteria for a reconstruction, as defined in 40 CFR 63, Subpart A, § 63.2;

   c. The address (i.e., physical location) or proposed address of the source;

   d. An identification of the relevant standard that is the basis of the application;

   e. The expected commencement date of the reconstruction;

   f. The expected completion date of reconstruction;

   g. The anticipated date of (initial) startup of the source;

h. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified in the relevant standard, or if actual emissions data are not yet available, an estimate of the type and quantity of hazardous air pollutants expected to be emitted by the source reported in units and averaging times specified in the relevant standard. The owner or operator may submit percent reduction information if a relevant standard is established in terms of percent reduction. However, operating parameters, such as flow rate, shall be included in the submission to the extent that they demonstrate performance and compliance;

i. A brief description of the affected source and the components that are to be replaced;

j. A description of present and proposed emission control systems (i.e., equipment or methods). The description of the equipment to be used for the control of emissions shall include each control device for each hazardous air pollutant and the estimated control efficiency (percent) for each control device. The description of the method to be used for the control of emissions shall include an estimated control efficiency (percent) for that method. Such technical information shall include calculations of emission estimates in sufficient detail to permit assessment of the validity of the calculations;

k. An estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new source;

l. The estimated life of the affected source after the replacements; and

m. A discussion of any economic or technical limitations the source may have in complying with relevant standards or other requirements after the proposed replacements. The discussion shall be sufficiently detailed to demonstrate to the DEQ satisfaction that the technical or economic limitations affect the source's ability to comply with the relevant standard and how they do so.

n. If in the application for approval of reconstruction the owner or operator designates the affected source as a reconstructed source and declares that there are no economic or technical limitations to prevent the source from complying with all relevant standards or other requirements, the permittee need not submit the information required in subparagraphs k-m of this section, above.

o. A notification of the actual date of startup of the source, delivered or postmarked within 15 calendar days after the date for reconstruction approved for an application submitted under this section.

(9 VAC 5-80-110 F, 40 CFR 63, Subpart A, § 63.5(b)(4), § 63.5(d)(1)(i & ii), § 63.5(d)(3), § 63.5(d)(3)(i-vi), § 63.9(b)(4), § 63.9(b)(4)(i &v), § 63.9(b)(5), and Condition 48 of NSR permit dated 11/08/2002)

2. The permittee shall submit to the DEQ an application for approval of the construction of a new major affected source subject to any subpart of 40 CFR 63. The application shall be submitted as soon as practicable and well in advance of the reconstruction planned commencement date in order for the timely review and approval by the DEQ so that the planned commencement date will not be delayed. A separate application shall be submitted for each reconstruction. Each application for approval of construction shall include at a minimum:

   a. The applicant's name and address;

   b. A notification of intention to make any physical or operational change to a major affected source that may meet or has been determined to meet the criteria for a reconstruction, as defined in 40 CFR 63, Subpart A, § 63.2;

   c. The address (i.e., physical location) or proposed address of the source;

   d. An identification of the relevant standard that is the basis of the application;

   e. The expected commencement date of the reconstruction;

   f. The expected completion date of reconstruction;

   g. The anticipated date of (initial) startup of the source;

   h. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified in the relevant standard, or if actual emissions data are not yet available, an estimate of the type and quantity of hazardous air pollutants expected to be emitted by the source reported in units and averaging times specified in the relevant standard. The owner or operator may submit percent reduction information if a relevant standard is established in terms of percent reduction. However, operating parameters, such as flow rate, shall be included in the submission to the extent that they demonstrate performance and compliance;

i. Technical information describing the proposed nature, size, design, operating design capacity, and method of operation of the source, including an identification of each point of emission for each hazardous air pollutant that is emitted (or could be emitted) and a description of the planned air pollution control system (equipment or method) for each emission point.

j. The description of the equipment to be used for the control of emissions shall include each control device for each hazardous air pollutant and the estimated control efficiency (percent) for each control device. The description of the method to be used for the control of emissions shall include an estimated control efficiency (percent) for that method. Such technical information shall include calculations of emission estimates in sufficient detail to permit assessment of the validity of the calculations.

k. A notification of the actual date of startup of the source, delivered or postmarked within 15 calendar days after the date for construction approved for an application submitted under this section.

(9 VAC 5-80-110 F,40 CFR 63, Subpart A, § 63.5(b)(4), § 63.5(d)(1)(i & ii), § 63.5(d)(2), § 63.9(b)(4), § 63.9(b)(4)(i &v), § 63.9(b)(5), and Condition 49 of NSR permit dated 11/08/2002)

3. All reports will be sent to:

DEQ/TRO
5636 Southern Blvd
Virginia Beach, VA 23462
With a copy to:
Chief, Air Enforcement Branch (3AP13), U.S. EPA, Region III
ATTN. Subpart KK Coordinator
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-80-110 F, 40 CFR 63, Subpart A§63.9(a)(4)(ii), and Condition 48.p and 49.l of NSR permit dated 11/08/2002)

IX. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C 2)
101	Gravure ink/coating storage room	VOC	
102	Litho Ctr solvent storage room	VOC	
103	Solvent storage tank farm, each tank less than 1000 gal	VOC	
105	Gravure Dept parts washer	VOC	
106	Gravure ink coloring & dispensing system	VOC	
107	Product quality control storage area (hot house)	VOC	
108	Cyclone paper baler system	PM	
110	Boiler # 1, nat gas only		4.2 MM Btu/hr
111	Boiler # 2, nat gas only		5.1 MM Btu/hr
112	Maintenance Lubrication Distribution Center	VOC	

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110

X. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR 60, Subpart QQ	Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing	Publication Rotogravure Printing Presses
40 CFR 63, Subpart T	Halogenated Solvent Cleaners	Halogenated Solvent Cleaners

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

XI. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete renewal application to the Department consistent with 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.

3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.

4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal, but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied, and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant to section 9 VAC 5-80-80 D, the applicant fails to submit, by the deadline specified in writing by the Board, any additional information identified as being needed to process the application.
(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D, and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

   a. The date, place as defined in the permit, and time of sampling or measurements.

   b. The date(s) analyses were performed.

   c. The company or entity that performed the analyses.

   d. The analytical techniques or methods used.

   e. The results of such analyses.

   f. The operating conditions existing at the time of sampling or measurement.
   (9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
(9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ and EPA. Reports shall cover a period of six months. The reporting periods shall be from the first day of the month to the last day of the sixth month. Reports shall be postmarked or delivered no later than 60 days following the end of the reporting period. The first reporting period shall commence the first day of September 1, 2002. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

   a. The time period included in the report.

   b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:

      (1) Exceedance of emissions limitations or operational restrictions;

      (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,

      (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

   c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that “no deviations from permit requirements occurred during this semi-annual reporting period.”

4. One copy of the monitoring report shall be sent to:

   DEQ/TRO
   5636 Southern Blvd.
   Virginia Beach, VA 23462

   With a copy to EPA at the following address:

   Clean Air Act Title V Compliance Certification (3AP00)
   U. S. Environmental Protection Agency, Region III
   1650 Arch Street
   Philadelphia, PA 19103-2029.

   (9 VAC 5-80-110 F, 40 CFR 63, Subpart A§63.9(h)(3), and 40 CFR 63, Subpart KK§63.830(b)(3))

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for a period of twelve months. The report shall be postmarked or delivered no later than 60 days following the end of the 12-month period. The reporting periods shall coincide with the monitoring reporting periods. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification.

2. The identification of each term or condition of the permit that is the basis of the certification.

3. The compliance status.

4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.

6. Such other facts as the permit may require to determine the compliance status of the source.

The annual compliance certification shall be sent to DEQ at the following address:

DEQ/TRO
5636 Southern Blvd.
Virginia Beach, VA 23462

With a copy to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5, 40 CFR 63, Subpart A§63.9(h)(3), and 40 CFR 63, Subpart KK§63.830(b)(3))

E. Permit Deviation Reporting

The permittee shall notify the Director, Tidewater Regional Office, within four daytime business hours of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the occurrence, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition XI.C.3 of this permit.
(9 VAC 5-80-110 F.2)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Tidewater Regional Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Tidewater Regional Office.
(9 VAC 5-20-180 C, and Condition 38 of NSR permit dated 11/08/2002)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9 VAC 5-80-190, 9 VAC 5-80-260, 9 VAC 5-80-1210, and Condition 1 of NSR permit dated 11/08/2002, as amended on 04/21/2003)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
   (9 VAC 5-80-110 G.6, 9 VAC 5-170-60, 9 VAC 5-20-160, and Condition 40 of NSR dated 11/08/2002)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
   (9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-305 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-355. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;

4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-50-20)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1. (9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-150 E, 9 VAC 5-170-160, and Condition 41 of NSR permit dated 11/08/2002)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160, 9 BAC 5-80-1240, and Condition 39 of NSR permit issued 11/08/2002)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the conditions of paragraph 2 are met.

2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

   a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.

   b. The permitted facility was at the time being properly operated.

   c. During the period of malfunction, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit.

   d. The permittee notified the board of the malfunction within two working days following the time when the emissions limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, telegraph, or any other method that allows the permittee to comply with the deadline. The notice fulfills the requirement of 9 VAC 5-80-110 F.2. b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirements under 9 VAC 5-20-180 C.

3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source.

4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-190 C, 9 VAC 5-80-260, 9 VAC 5-80-1210, and Condition 31 of NSR permit dated 11/08/2002)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Y. Asbestos Requirements

The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).
(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

Z. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

BB. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.

2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)

XII. State-Only Enforceable Requirements

The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

Odor, 9 VAC 5-50-140

(9 VAC 5-80-110 N and 9 VAC 5-80-300)

November 5, 2003

Mr. John Cotè
General Manager
Shorewood Packaging Corporation of Virginia
815 Chapman Way
Newport News, VA 23608

Location: Newport News
Registration No: 60913
AFS No: 51-700-00066

Dear Mr. Cotè:

Attached is a significant modification to the Federal Operating Permit (Article 1) to operate a packaging rotogravure facility and lithographic press center pursuant to 9 VAC 5 Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution.

The permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all permit conditions carefully.

In evaluating the application and arriving at a final decision to issue this permit, the Department deemed the application complete on March 18, 2003, and solicited written public comments by placing a newspaper advertisement in the Daily Press newspaper on August 17, 2003. The thirty-day comment period (provided for in 9 VAC 5-80-270) expired on September 16, 2003. No comments were received.

This approval to operate does not relieve Shorewood Packaging of the responsibility to comply with all other local, state, and federal permit regulations.

Mr. John Cotè
November 5, 2003

Issuance of this permit is a case decision. The Regulations, at 9 VAC 5-170-200, provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

Additionally, as provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal to court by filing a Notice of Appeal with:

Mr. Robert G. Burnley, Director
Department of Environmental Quality
P.O. Box 10009
Richmond, Virginia 23240-0009

In the event that you receive this permit by mail, three days are added to the period in which to file an appeal. Please refer to Rule 2A of the Supreme Court of Virginia for additional information including filing dates and the required content of the Notice of Appeal.

If you have any questions concerning this permit, please call Mr. Barry Halcrow at 757-518-2184.

Sincerely,

Harold J. Winer
Deputy Regional Director

HJW/bwh/Shorewood FOP sig amend 2003.doc
Attachment: Permit
Statement of Legal and Factual Basis for the Modification

cc: Director, OAPP (electronic file submission)
Manager, Data Analysis (electronic file submission)
Chief, Air Enforcement Branch (3AP13), U.S. EPA, Region III